

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division

CONSUMER FINANCIAL PROTECTION
BUREAU; COMMONWEALTH OF
MASSACHUSETTS; THE PEOPLE OF
THE STATE OF NEW YORK, by LETITIA
JAMES, Attorney General of the State of
New York; and COMMONWEALTH OF
VIRGINIA, *EX REL.* MARK R. HERRING,
ATTORNEY GENERAL,

Plaintiffs,

v.

NEXUS SERVICES, INC.; LIBRE BY
NEXUS, INC.; MICHEAL DONOVAN;
RICHARD MOORE; and EVAN AJIN,

Defendants.

Case No.: 5:21-cv-00016-EKD

MOTION FOR LEAVE TO WITHDRAW

I, David G. Bayles, of the law firm ArentFox Schiff LLP and counsel for Defendants Nexus Services, Inc.; Libre by Nexus, Inc.; Micheal Donovan; Richard Moore; and Evan Ajin, (collectively, “Nexus”), request that this Court permit me to withdraw as counsel of record for good cause shown, and state the following in support thereof:

1. Pursuant to Rule 1.16 of the Rules of Professional Conduct of the Virginia State Bar, undersigned counsel is unable to continue to represent the Defendants in this matter due to irreconcilable differences.

2. If the court deems necessary, Mr. Bayles will do his best to supplement the matters and reasons for requesting leave to withdraw, subject to the duty of confidentiality under Rule 1.6.

3. Defendants have been notified of counsel's intention to withdraw, and have agreed to secure substitute counsel.

4. Adam Bowser and J.H. Jennifer Lee, co-counsel in this matter, are also moving to withdraw their appearance.

5. Defendants consent to the relief sought herein and represent that substitute counsel will promptly enter an appearance.

WHEREFORE, David G. Bayles, counsel for Defendants, respectfully moves this Court for entry of an Order permitting him to immediately withdraw as counsel of record in this case.

Dated: June 23, 2022

Respectfully submitted,

ARENTFOX SCHIFF LLP

By: /s/ David G. Bayles

David G. Bayles

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